

Data Protection Policy

neuroClues (powered by P3Lab)

Version 3.0 - March 2026

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1. Introduction

1.1 What is this policy about?

This is the data protection policy of P3Lab doing business as neuroClues, having its registered office at Rue du Morimont 33, 1341 Ceroux-Mousty, company number 0750.746.841, email contact info@neuroclues.com, (hereinafter “we”, “us” or “our”) with regard to the processing of personal data of persons external to our organization (clients, prospects, suppliers, etc.). For the purposes identified below, we act as controller regarding the processing of your personal data.

This policy applies only to the processing of data of physical persons, not of legal persons.

The policy may be updated whenever necessary to reflect changes in our products and services, or applicable regulations. The latest version will always be available on the website <https://neuroclues.com>.

1.2 How do we receive your personal data?

We can receive your personal data from you directly. We can also receive your personal data from our clients active in the medical industry. Sometimes, we can receive your contact details via the organization where you work (your employer, your instructing party, etc.).

In some cases we can also find, update, supplement and improve your contact details via public sources and social networks.

If you entrust us with personal data of people other than yourself (contact persons, etc.) in the context of one of the below-mentioned purposes, we assume that you are processing this data legally and that you can communicate it to us.

Regarding data collected through our neuroClues Solution, please see section 2.7 (“you are a patient of one of our clients”).

2. For which purposes do we process your personal data?

Depending on your relationship with us, we can process your personal data for different purposes.

2.1 *You are a client*

If you are our client or work at/for our client, we process your personal data for the following purposes:

- Client management (file management, client relationship management, invoicing, recovery, authentication, authorization, accounting, etc.) according to the need to execute a contract concluded with you. Without your personal data, we cannot execute the contract;
- Direct marketing based on our legitimate interest to promote and keep you informed about our services and activities;

We keep your personal data for a maximum of 10 years after the end of our contractual relationship.

2.2 *You are a prospect*

If you are a potential client, we process your personal data for the following purposes:

- Prospecting management on the basis of the need to take pre-contractual measures (if you wish to become a client);
- Direct marketing based on your consent.

You can always withdraw your consent.

We retain your contact details for up to 10 years after you become inactive as a prospect.

2.3 *You are a supplier*

If you provide products or services to us or if you work at/for one of our products/services suppliers, we process your personal data for supplier management purposes on the basis of the need to execute a contract concluded with you (or the organization you work for). Without your personal data, we cannot execute the contract.

We keep your personal data for a maximum of 10 years after the end of the contractual relationship.

2.4 *You are a participant in one of neuroClues' activities*

If you participate in a neuroClues' activity (reception, seminar, webinar, etc.), we will process your personal for the following purposes:

- The organization of the neuroClues' activity based on the execution of the agreement with you, in particular your subscription to our activity;
- Direct marketing based on our legitimate interest to promote and keep you informed about our services and activities.

We keep your personal data for up to 10 years after you have become inactive as contact.

2.5 You are a visitor to neuroClues's website

If you visit our website, we process your personal data for the following purposes:

- To answer your question or request for information in order to take pre-contractual measures at your request;
- For the placing and reading of cookies, if you provide us with your consent or based upon our legitimate interest to place cookies necessary for the functioning of our website. You can find more information regarding our use of cookies in our Cookie policy available on our website.

2.6 You are a job applicant

If you apply for a job with us, we process your personal data relating to the application for:

- The handling and evaluation of your application in the context of the taking of pre-contractual measures;
- Maintaining a recruitment reserve based on the need to look after our legitimate interest. Our legitimate interest consists of contacting you later for a job opportunity if there is no vacancy immediately available. If you do not wish to be included in the recruitment reserve, you can always object to this.

We keep your personal data for a maximum of 10 years after your application (unless you object thereto).

2.7 You are a patient of one of our clients

neuroClues' main activity is providing our clients, who are active in the medical industry, with our neuroClues solution for eye movement tracking (for more information, see <https://neuroclues.com>). When our clients use this medical device with you, we will process certain personal data on behalf of our clients.

Furthermore, from this use, we keep in a pseudonymized version demographic data (age and gender), time courses extracted from eye movement recordings; the values of the biomarkers extracted from these time courses, and when accessible, recorded eye movement videos and certain data relating to the clinical evaluation (e.g test results) for:

- the “training” of the AI-based image processing algorithm of our medical device based upon our legitimate interest to improve the functioning of neuroClues and the necessity to conduct scientific research, i.e. contribute to increasing scientific knowledge about neurological diseases, motor disorders or vision problems as well as to analyze the evolution thereof;
- the building of biomarker statistical models and increase of scientific knowledge upon our legitimate interest to enhance the functioning of neuroClues and contribute to increasing scientific knowledge about neurological diseases, motor disorders or vision problems as well as to analyze the evolution thereof. Biomarker data consists of biological indicators that help measure certain biological states, processes, conditions or characteristics.

Because both processing activities are only conducted on the basis of pseudonymized data, we have no information to directly identify you. Therefore, section 5 (“what are your rights”) shall not apply for these processing activities as it is impossible for neuroClues to link any such data to a specific individual.

2.8 In any case: managing fraud, abuse and disputes

In any case, whatever your relationship with us, we may also process your personal data for the following purposes:

- Detecting, preventing and combating fraud and abuse on the basis of the need to look after our legitimate interest. Our legitimate interest consists in fighting against fraud and abuse;
- Handling of our own disputes on the basis of the need to protect our legitimate interest. Our legitimate interest consists in being able to safeguard our rights in the event of disputes.

In that case, we keep your personal data for a maximum of 10 years, unless the detection, prevention and combating of fraud and abuse, or dispute management, requires the personal data to be kept for a longer period.

3. Who receives your personal data?

In order to achieve the aforementioned purposes, we may share your personal data with:

- Employees and working students of neuroClues, insofar as they need your personal data for the performance of their duties;

- subcontractors who process personal data on our behalf (processors);
- courts, lawyers, bailiffs, notaries, judicial experts and other judicial actors to the extent necessary for the institution, exercise or substantiation of a legal claim;
- independent consultants to the extent necessary for the organization of neuroClues or the institution, exercise or substantiation of a legal claim;
- judicial, police or administrative authorities, where required by law or to the extent necessary for the institution, exercise or substantiation of a legal claim;
- legal assistance insurers when our services are covered by a legal assistance policy.

4. Do we share your personal data outside the European Union?

Our servers are located in European Union if you are an EU-based client of us and in the United States if you are an US-based client of us. We will keep personal data originating from the EU within the EU and personal data originating from the US within the US.

5. What are your rights?

When we process your personal data, you have several rights:

- You always have the **right to access** your personal data. This allows you to find out which personal data we process about you.
- You always have the **right to correct** your personal data. This allows you to correct or complete incorrect or incomplete personal data that we process about you.
- You have the **right of deletion** of your personal data. This allows you to permanently delete the personal data we process about you. We are not always obliged to delete your personal data at your request - this right only applies in the cases and to the extent provided for by law.
- You have the **right to limit** the processing of personal data relating to you. This allows you to freeze our use of your personal data without deleting it. We are not always obliged to limit the processing of your personal data at your request - this right only applies in the cases and to the extent provided for by law.
- You have the **right to object to the processing of your personal data**. This allows you to object to the further processing of your personal data. We are not always obliged to accept your objection - this right only applies if we process your personal data on the basis of our legitimate interest.

- You always have the **right to withdraw your consent** when the processing of your personal data takes place on the basis of your consent.
- You always have the **right to object** to the processing of your personal data for direct marketing purposes.
- You have the **right to data portability**. This allows you to easily transfer, copy or move personal data from one controller to another. This right can only be exercised if the processing is based on your consent or on an agreement concluded with you.

You can exercise your rights or contact us via our Data Protection Officer:

neuroClues
To the attention of the Data Protection Officer
Avenue Jean Monnet 1
1348 Louvain-la-Neuve
Email: dpo@p3lab.com

You can also always lodge a request or complaint with the supervisory authority of the place where you reside. For Belgium, this is:

Data Protection Authority
Drukpersstraat 35 - Rue de la Presse 35
1000 Brussels
contact@apd-gba.be
Tel.: +32 2 247 48 00
<https://www.dataprotectionauthority.be/>

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